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9 Attorneys for Plaintiffs, Georgiou Family
10 Trust; Byron Georgiou individually and as
11 trustee of the Georgiou Family Trust; and
Benjamin Hill Realty, LLC

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**
14

15 Georgiou Family Trust, a Nevada trust;
16 Byron Georgiou, as an individual and as
17 trustee of the Georgiou Family Trust;
18 Benjamin Hill Realty, LLC, a Nevada
limited liability company.

19 Plaintiffs,

20
21 v.

22 Phillip V. Ruthen, an individual; Shaw
23 Industries Inc., a corporation; L. Lake
24 Jordan, an individual; Suncrest Stone
25 Products, LLC, a business entity;
Jeffrey W. Stevens, an individual; and
Does 1-100,

26
27 Defendants.
28

CASE NO.: 2:21-cv-01060-JCM-DJA

**STIPULATION AND
ORDER TO
EXTEND TIME TO FILE
PLAINTIFFS' RESPONSE TO
DEFENDANTS' MOTIONS TO
DISMISS AND MOTIONS TO
CHANGE VENUE FROM
CURRENT DEADLINE OF
OCTOBER 1, 2021 TO OCTOBER
15, 2021**

(FIRST REQUEST)

**TO THE CLERK OF THE ABOVE-TITLED COURT AND TO ALL
PARTIES AND THEIR ATTORNEYS OF RECORD:**

IT IS HEREBY STIPULATED by and between the parties through their respective counsels that Plaintiffs Georgiou Family Trust; Byron Georgiou; and Benjamin Hill Realty, LLC ("Plaintiffs") shall have through and including October 15, 2021, within which to file and serve a response to the motions of Defendants Phillip V. Ruthen, Shaw Industries Inc. and L. Lake Jordan ("Defendants") to dismiss and/or to change venue (ECF No. 22, 24, 25, 26, 29). The current deadline for Plaintiffs to respond to all five motions is currently set for October 1, 2021.

This is the first request for extension from the original due date of October 1, 2021. Pursuant to Local Rule IA 6-1(a), the Parties state the reason for the extension of time is that the attorneys for Plaintiffs need to fully review all five motions and prepare responses thereto. The motions to change venue contain factual allegations and alleged evidence which Plaintiffs need sufficient time to review and respond to. The Parties have therefore agreed to an extension of time to file a response. The Parties have entered into an agreement in good faith and not for purposes of delay. It is respectfully requested that the Court approve this stipulation and provide Plaintiffs until October 15, 2021 to respond to the motions.

MURCHISON & CUMMING, LLP

DATED: September 30, 2021

/s/ Pamela C. Chalk

Pamela C. Chalk, Esq.

Anton N. Handal, Esq.

Attorneys for Plaintiffs

LEWIS ROCA ROTHGERBER CHRISTIE LLP

DATED: September 30, 2021

/s/ J.Christopher Jorgensen

J.Christopher Jorgensen, Esq.

Chelsee C. Jensen, Esq.

Attorneys for Defendant

Shaw Industries Inc.

BAILEY ❖ KENNEDY

1 DATED: September 30, 2021

/s/ Andrea M. Champion

2 Dennis L. Kennedy, Esq.

3 Andrea M. Champion, Esq.

4 Attorneys for Defendant Phillip V. Ruthen

LIPSON NEILSON P.C

5
6 DATED: September 30, 2021

/s/ Megan H. Thongkham

7 Joseph P. Garin, Esq.

8 Megan H. Thongkham, Esq.

9 Attorneys for Defendant L. Lake Jordan

ORDER

10
11 IT IS SO ORDERED.

12 
UNITED STATES DISTRICT COURT JUDGE

13 DATED: October 1, 2021

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing document has been served on this date to all counsel of record, if any to date, who are deemed to have consented to electronic service via the Court's CM/ECF system. Any other counsel of record will be served by electronic mail, facsimile and/or overnight delivery upon their appearance in this matter.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct. Executed this 30th day of September, 2021.

DATED: September 30, 2021

MURCHISON & CUMMING, LLP

/s/ Pamela C. Chalk

Pamela C. Chalk